

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

RYAN COPLEY, PAT MCGEENEY, JOE
TILLEY,

Case No. 2:20-CV-01442

Plaintiffs,

Judge Christy Criswell Wiegand

v.

EVOLUTION WELL SERVICES
OPERATING LLC.,

Defendant.

**PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION OF COLLECTIVE
CLASS AND JUDICIAL NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA**

AND NOW, come Plaintiffs, by and through their undersigned counsel, and move this Court to approve the sending of notice pursuant to Section 216(b) of the Fair Labor Standards Act of 1938 ("FLSA"), as amended, 29 U.S.C. § 201 *et seq.* to the following group of potential plaintiffs:

All current and former rotational non-exempt employees who were employed by Defendant on or after August 25, 2017 and who elect to opt-in to this action pursuant to the FLSA, 29 U.S.C. § 216(b) (the "FLSA Collective").

This Motion incorporates Plaintiffs' Memorandum of Law in Support of Motion for Conditional Certification of Collective Class and Judicial Notice Pursuant to Section 216(b) of the FLSA, including Exhibits, filed concurrently herewith.

WHEREFORE, Plaintiffs respectfully request that this Court enter an Order:

- 1) Promptly authorizing this case to proceed as a collective action;
- 2) Directing Defendant to product a list, in electronic and importable format, of all

Hitch Employees who worked for Defendant during the applicable statutory period, including their name, job title, address, e-mail address, mobile telephone number, dates of employment, date of birth, and last four digits of their Social Security number;

- 3) Directing the parties to meet and confer regarding a proposed notice to the members of the collective; and
- 4) Authorizing the issuance of the parties' proposed notice if agreed upon, or if not agreed upon after having met and conferred, the Plaintiffs' proposed notice, to be mailed, e-mailed, and texted to all potential opt-in plaintiffs, within ten days of the Court's Order.

A proposed Order is attached.

Dated: November 17, 2021

Respectfully Submitted,

/s/ Edwin J. Kilpela
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Counsel to Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of November, 2021, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Edwin J. Kilpela
Edwin J. Kilpela